

JOINT PROPOSED PRETRIAL ORDER

Pulliam v. County of Fort Bend, Texas, et al.

Case No. 4:22-cv-4210

ATTACHMENT G

Joint Trial Worksheet

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUSTIN PULLIAM,

Plaintiff,

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;
SHERIFF ERIC FAGAN, in his individual
capacity; OFFICER ROBERT
HARTFIELD, in his individual capacity;
OFFICER JONATHAN GARCIA, in his
individual capacity; OFFICER TAYLOR
ROLLINS, in his individual capacity; and
OFFICER RICKY RODRIGUEZ, in his
individual capacity,

Defendants.

JOINT TRIAL WORKSHEET

OPENING

Minutes Requested by Plaintiff: 30

Minutes Requested by Defendants: 30

EVIDENCE

Witness Name:

Justin Pulliam (Plaintiff)

Subject Matter:

Personal background as an independent citizen journalist; typical encounters with law enforcement, including Fort Bend County Sheriff's officers; the July 12, 2021 press conference; December 21, 2021 exclusion from scene and arrest; indictment and trial following December 21, 2021 arrest; Fort Bend County's other arrests for interference with public duties; damages

Time for Direct:

4 hours

Time for Cross:

3 hours

Witness Name:	Deputy Ricky Rodriguez		
Subject Matter:	Personal background; Pulliam's exclusion from scene and arrest on December 21, 2021. Edwin Kraft's history.		
Time for Direct:	30–45 minutes	Time for Cross:	1 hour

Witness Name:	Lieutenant Taylor Rollins (Defendant)		
Subject Matter:	Personal background; Pulliam's exclusion from scene and arrest on December 21, 2021. Edwin Kraft's history.		
Time for Direct:	60–90 minutes	Time for Cross:	2 hours

Witness Name:	Sheriff Eric Fagan (Defendant)		
Subject Matter:	Personal background and election to Sheriff; Fort Bend County Sheriff's Office policies; personal interactions with Pulliam and Fort Bend County Sheriff's Office's customs and policies concerning Pulliam; events at and near Jones Creek Ranch Park on July 12, 2021; Pulliam's exclusion from scene and arrest on December 21, 2021; visit to Pulliam in Fort Bend County Jail; Fort Bend County Sheriff's Office actions following Pulliam's arrest		
Time for Direct:	1–2 hours	Time for Cross:	2 hours

Witness Name:	Detective Travis James		
Subject Matter:	Personal background; Pulliam's December 21, 2021 arrest and the subsequent investigation		
Time for Direct:	20–30 minutes	Time for Cross:	1 hour

CLOSING

Minutes Requested by Plaintiff: 30 minutes

Minutes Requested by Defendant: 30 minutes

Additional informational information that may impact the amount of time needed for trial of this case:

- **Plaintiff:** Much of the testimony will involve video recordings and therefore time for each witness includes the time to watch video excerpts. Plaintiffs have scheduled a technology orientation for the courtroom and, barring any glitches with the new system, do not anticipate any technology problems presenting video.
- **Defendants:** Technology issues may impact time needed for trial.

Total Number of Hours and Minutes Estimated for Trial:

by Plaintiff: 9.75 hours

by Defendant: 8.5 hours

Dated: July 1, 2025

Respectfully submitted,

/s/ Christen Mason Hebert
Christen Mason Hebert, Attorney-in-Charge
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**Admitted pro hac vice*

Dated: July 1, 2025

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2025, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Christen Mason Hebert
Christen Mason Hebert, Attorney-in-Charge

Counsel for Plaintiff